

IN THE NAME UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JEREMY BAILEY,
PLAINTIFF,

FILED
SCRANTON

NO. 1:20 - CV- 1836

AUG 02 2021

V.

Per. 
DEPUTY CLERK

DISTRICT JUDGE: KANE

LIUTENTANT YODER,
JOHN DOE(S) et al ..
DEFENDANTS,

PLAINTIFF SECOND SET OF INTERROGATORIES TO DEFENDANTS

In accordance with Rule 33 of the federal Rule of Civil procedure, plaintiff requests that Defendant lieutenant yoder answer the following interrogatories under oath, and that the answers be sign by the person making them and be serve on plaintiff within 30 days of service of these interrogatories.

If you can answer the following interrogatories in full, after exercising due diligence to secure the information to do inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portion.

These interrogatories shall be deemed continuing, so as to require supplemental answers as new and different information materializes.

1. What is a Z- CODED in the SCI state facilities.
2. Why was Z-CODE inmate MCcullough # GA 6396 moved from his singgle cell and place in the cell with inmate Bailey # LZ 4437.
3. Are you a lieutenant for the (SCI) coaltownship facility.

4. Was you the lieutenant supervisor for the level " 5 " unit of the R.H.U. in (SCI) coaltownship.
5. Was you on duty on september 10, 2019 in level " 5 " unit of the R.H.U..
6. Whats your responsibility as a lieutenant supervisor in the level " 5 " unit of the R.H.U..
7. Was inmate McCullough # GA 6396 a Z- CODE on september 10, 2019.
8. How is a cell change conducted in the level " 5 " unit of the R.H.U..
9. Does the bed sheet show that a inmate is Z- CODED.
10. Does the R.H.U. stand for Restricted Housing Unit.
11. Did inmate McCullough # GA 6396 remain a Z- CODE after he assaulted inmate Bailey # LZ 4437.
12. Where was you at the time when inmate McCullough # GA 6396 was be remove from his single cell.



JEREMY BAILEY # LZ-4437

1 KELLEY DRIVE

COALTOWNSHIP PA , 17866.

DATE: 7.28.2021

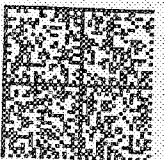
JEREMY BAILEY # 121437
(SCI) COAL TOWNSHIP
1 KELLEY DRIVE
COAL TOWNSHIP PA 17866

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